

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE

ROBERTO RIZZO,

Plaintiff,

Case No.: 2:21-cv-00082

v.

**COMPLAINT**

ALASKA BOAT COMPANY, LLC,

Defendant.

**NOW COMES** Plaintiff, by and through his undersigned counsel, O'BRYAN BAUN  
KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this  
forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and  
under the General Maritime Law for unseaworthiness, maintenance, and cure.

3. At all times material to issues herein Plaintiff served as an employee of Defendant  
serving as a crewmember aboard its vessels, with all acts and/or omissions giving rise to this action  
occurring in the course of Plaintiff's employment in the service of his ship.

1  
2 4. On or about September 20, 2020, Plaintiff, without adequate equipment and/or  
3 assistance, was required to handle a certain, too weighty spool of nylon line, when in the process  
4 thereof, he was injured by said unseaworthy conditions/failure to provide a safe place to work.

5  
6 5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages,  
7 *inter alia*, as follows:

- 8 a. Pain and suffering, past future;  
9 b. Mortification, humiliation, fright, shock and embarrassment;  
10 c. Loss of earnings and earning capacity;  
11 d. Hospital, pharmaceutical and other cure expenses;  
12 e. Aggravation of prior condition, if any there be;  
13 f. Inability to engage in social, recreational, and other pursuits previously  
14 enjoyed;  
15 g. Mental anguish;  
16 h. Found;  
17 i. Maintenance, cure, wages and/or attorney fees.

18  
19 **WHEREFORE**, Plaintiff demands trial by jury and judgment against Defendant, together  
20 with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the  
21 pendency of this cause.  
22

23 O'BRYAN BAUN KARAMANIAN

24 /s/ Dennis M. O'Bryan

25 DENNIS M. O'BRYAN (P30545)

26 Attorneys for Plaintiff

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-and-

DAVIS LAW GROUP, P.S.

/s/ Christopher M. Davis

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Dated: January 22, 2021